

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
JACKSON DIVISION**

OLIVIA Y., by and through her next friend, James D. Johnson;  
JAMISON J., by and through his next friend, Clara Lewis; AND  
DESIREE, RENEE, TYSON, AND MONIQUE P.,  
by and through their next friend, Sylvia Forster; on their  
own behalf and on behalf of all others similarly situated

PLAINTIFFS

V.

CIVIL ACTION NO. 3:04CV251LN

HALEY BARBOUR, as Governor of the State of Mississippi;  
DONALD TAYLOR, as Executive Director of the Department  
of Human Services; AND BILLY MANGOLD,  
as Director of the Division of Family and Children's Services

DEFENDANTS

**PLAINTIFF'S MOTION FOR ADMISSION *PRO HAC VICE*  
OF JOHN PISKORA**

COME NOW Plaintiffs and, pursuant to Rule 83.1(A)(2) of the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi, moves the Court for an Order admitting John A. Piskora *pro hac vice* as additional counsel for Plaintiffs, and would show the Court the following:

1. John A. Piskora is a non-resident who is not a member of the Mississippi Bar and is not authorized to practice before the Mississippi Supreme Court.

2. He is a member of the law firm Loeb & Loeb LLP, located at 345 Park Avenue, New York, New York 10154. His telephone number is (212) 407-4000. His facsimile number is (212) 407-4990.

3. He is familiar with the Uniform Local Rules of the United States District Courts for the Northern and Southern Districts of Mississippi. *See* Affidavit of John A. Piskora, attached as Exhibit 1.

4. He is a member in good standing of the New York Bar and has been licensed to practice in New York since 2001. He is admitted to practice in the United States District Court for the Southern District of New York, as evidenced in the Certificate of Good Standing, attached as Exhibit 2.

5. John A. Piskora will be associated with Melody McAnally, a member in good standing with the Mississippi Bar. Her Mississippi State Bar number is 101236. Her office address is Suite 450, One Jackson Place, 188 East Capitol Street, Post Office Box 1789, Jackson, Mississippi, 39215. Her direct telephone number is (601) 592-9944. Her facsimile number is (601) 592-1444.

WHEREFORE, Plaintiffs requests that the Court issue an Order admitting John A. Piskora, *pro hac vice*, and for such other relief as may be justified.

Respectfully submitted, this the 30th day of June, 2005.

/s Melody McAnally  
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Melody McAnally (MBN 101236)  
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*PLAINTIFFS' COUNSEL*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 30, 2005, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to the following:

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s/ Melody McAnally